



Privacy Policy

Who we are

Jennifer Rudd Case Management Services Ltd delivers independent Case Management services under instruction from a referring solicitor. Jennifer Rudd Case Management Services Ltd is directed by Jennifer Rudd, Occupational Therapist, who is registered with the Health and Care Professions Council (HCPC), British Association of Brain Injury Case Managers (BABICM) and Royal College of Occupational Therapists (RCOT).

Jennifer Rudd Case Management Services Ltd is committed to protecting the privacy of information provided by clients.

Collection of personal information

Information about clients may be collected via spoken or written information from clients, family members, carers, or from the referring solicitor, consultant or GP who refer clients to Jennifer Rudd Case Management.

With consent, information may also be collected from other professionals (such as health professionals including but not limited to Occupational Therapists, Neuro-Psychologists, solicitors, family, friends, support workers, NHS therapists, doctors and other medical professionals. Jennifer Rudd Case Management Services Ltd may also collect information about family members where this relates to the client e.g. contact details for next of kin and relevant medical or social history.

With consent, before the first session, Jennifer Rudd Case Management Services Ltd asks the client, or their representative, to complete a brief sheet with personal details and case history, and to sign a consent form.

If you wish to make an enquiry you are asked to call or email Jennifer Rudd, director of Jennifer Rudd Case Management Services Ltd. On occasions, if Jennifer Rudd is not available to speak, you will speak with an authorised assistant. At this time, to progress the referral, you will be requested to provide relevant contact details, such as your name, email address, postcode and contact telephone number to enable us to respond to your enquiry.

You may provide comments or queries which contains personal information. If your enquiry does not result in you being seen by Jennifer Rudd Case Management Services Ltd, then this personal information will be deleted once your enquiry has been dealt with. If you are seen by Jennifer Rudd Case Management Services Ltd, these details will be added to your confidential client case notes and personal record.

When a Jennifer Rudd Case Management Services Ltd representative meets you for the first time, you are also likely to be asked questions about your current and past difficulties, and any other relevant case history information, including medical information.

Use of personal information

Personal information collected by Jennifer Rudd Case Management Services Ltd via email, telephone or face to face, is stored and used by the company for the purpose of delivering Case Management services to its clients. Any sensitive personal details are stored in a secure and confidential system and processed in confidence by Jennifer Rudd Case Management Services Ltd and shall only be used for the purposes of delivering appropriate Case Management services to clients. With a client's consent, information about Case Management needs will be shared with other professionals involved in the client's care, when it is believed to be in their best interests.

A record of the client's consent is kept within their case notes.

Unless Jennifer Rudd Case Management Services Ltd is required to do so by law, it will not disclose any personal information collected to any person other than as set out above. Jennifer Rudd Case Management Services Ltd does not employ agents to process personal data, for example specialist mailing companies, to send out communications. It does not give or sell client details to any third parties.

Jennifer Rudd Case Management Services Ltd uses this information:

- To prepare, plan and provide Case Management services appropriate to its client's needs
- To communicate with its clients via post, email, telephone, mobile messages and SMS in relation to:
 - confirming and preparing for appointments
 - general communication in-between appointments
 - sending reports and programmes (password protected)
 - copying a client in to communications with other professionals/family members involved with their care (initials/first name only rather than full name will be used in emails)
 - sending resources to a client
 - sending invoices and receipts to a client

You will be asked for your consent in relation to your preferences with regard to distributing reports (e.g. via post or email). Please note that if consenting to email correspondence, you understand that emails are never 100% safe (although attachments will always be password protected).

- For internal audit to assess and improve its service. Results of audits are always presented with all client identities removed.
- For management and administration

Whenever personal identifiers are not needed for these tasks, if possible they are removed from the information used.

Storage of personal information

All information about clients is stored securely in locked filing cabinets and electronic files (password-protected). Any cloud-based storage is GDPR compliant.

Documents which contain confidential information such as reports, meeting minutes and programmes are also individually password-protected from the outset. Any paper-based confidential information is stored securely.

Videos of clients may be taken with consent. These are temporarily stored on an encrypted and password-protected tablet. These may then be viewed by the Case Manager in order to make notes in a client record within 24 hours of the appointment. The video is then deleted. The minimum amount of confidential information will be taken out of the case Manager's office base.

When client's information is taken out of the office base (e.g. home/hospital) it will be kept with the Case Manager. The minimum amount of confidential information is taken off-site and will be stored safely upon return.

Jennifer Rudd Case Management Services Ltd adheres to guidelines set by its professional bodies with regard to the duration of storing data. Personal data will be stored for 8 years after discharge for an adult unless classified as mentally disordered (within the meaning of the Mental Health Act 1983) when it will be retained for 20 years after discharge. For children and young people, it will be kept up until up until 25th birthday, or until 26th birthday, if 17 was the age at conclusion of their treatment. Schools records for children or young people with special educational needs are kept for 35 years from the date of closure.

After the appropriate period, all records pertaining to the client will be destroyed. Paper notes will be shredded, and all electronic files will be erased. This includes any audio or video recordings that may have been stored.

With regard to audio/video recordings, these will only be taken with consent. Most will be erased immediately after each session, unless kept for comparison for before/after therapy to review progress. In this case, such recording will also be destroyed after 8 years (or otherwise) post-discharge and be recorded on a password protected device.

Meeting our professional obligations

It is a legal requirement for all Case Managers to be registered with the Health and Care Professions Council (HCPC). The HCPC has clear standards of conduct, performance and ethics to which all registrants must adhere. These standards affect the way in which Jennifer Rudd Case Management Services Ltd processes and shares information. Specifically:

Standard 2: Communicate appropriately and effectively

"You must share relevant information, where appropriate, with colleagues involved in the care, treatment or other services provided to a service user."

Standard 10: Keep records of your work

"You must keep full, clear, and accurate records for everyone you care for, treat, or provide other services to. You must complete all records promptly and as soon as possible after providing care, treatment or other services. You must keep records secure by protecting them from loss, damage or inappropriate access."

UK Data Protection Law and EU General Data Protection Regulations

Data Protection Law lays down wide-ranging rules, backed up by criminal sanctions, for the processing of information about identifiable, living individuals.

It also gives individuals certain rights in relation to personal data held about them by others.

Jennifer Rudd is registered with the Information Commissioner's Office (ICO) as a Data Controller.

Lawful basis for processing personal information

The lawful basis for Jennifer Rudd Case Management Services Ltd processing and storing personal information is one of 'legitimate interest' (under article 6 of GDPR). Jennifer Rudd Case Management Services Ltd cannot adequately deliver a service to its clients without processing their personal information.

As it is both a necessity for service delivery and of benefit to clients, Jennifer Rudd Case Management Services Ltd has a legitimate interest to process and store their data. Data relating to an individual's health is classified as 'Special Category Data' under section 9 of the GDPR.

Our responsibilities

Jennifer Rudd Case Management Services Ltd is committed to maintaining the security and confidentiality of client records. Jennifer Rudd Case Management Services Ltd actively implements security measures to ensure information is safe, and audits these regularly. Jennifer Rudd Case Management Services Ltd will not release personal details to any third party without first seeking a client's consent, unless this is allowed for or required by law. Jennifer Rudd Case Management Services Ltd is constantly working to ensure compliance with current data protection regulation.

Your rights

Data protection legislation gives you, clients/family of clients, various rights. The most important of these are as follows:

- You have the right to a copy of information held by Jennifer Rudd Case Management Services Ltd about yourself
- You have the right to ask for your record to be amended if you believe that it is wrong
- The lawful basis for processing and storing personal information in this practice is one of 'legitimate interest' (under article 6 of GDPR). You have the right to withdraw from therapy at any time and have a right to a copy of all your notes. However, a client does not have a right to be forgotten – that is, to have all their notes destroyed before the stipulated 8 years (or otherwise – please see section on storing data).

Breach of data

This includes hacking, unauthorised use of sensitive data, human error, unforeseen circumstances such as fire or flood, or any other breach of data. When the data processor has been informed or becomes aware of any breach of data, the following actions will take place:

- An incident form will be completed, detailing the time and nature of the breach, and if it is still ongoing.
- An investigation will take place to determine if any data can be recovered or limit the damage of the breach. The full consequences of the breach will be considered, and all parties who need to know about the breach will be notified. Experts may be consulted for their advice about how to manage the situation.
- A risk assessment will be drawn up (or existing risk assessment re-examined) to minimise the risk of such a breach re-occurring if possible.

How to access records

In order to access the information held about you or If you have any further questions about how we use your information, please email Jennifer Rudd Case Management Services Ltd at the address given below. A copy of your records is provided free of charge. We will provide access to your records within 30 days of receipt of all necessary information.

Please make your request in writing to:

Jennifer Rudd Case Management Services Ltd
jenniferrudd@ruddandco.co.uk